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1112-1 – Safety and Health Management (Chapter 15)
Telecommunication Tower Climbing Policy

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This Manual Release Supplement Transmits a new supplement to the BLM Safety and Health Management Handbook.
2. Reports Required: None
3. Materials Superseded: None
4. Filing Instructions: File as directed below.

REMOVE:

None

INSERT:

Insert at end of Chapter 15
with Illustrations

Signed by

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Authenticated by

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H-1112-1 SAFETY AND HEALTH MANAGEMENT

**Safety and Health Program
Telecommunication Tower Climbing Policy**

**United States Department of the Interior
BUREAU OF LAND MANAGEMENT
OREGON STATE OFFICE**

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**SAFETY AND HEALTH PROGRAM
TELECOMMUNICATION TOWER CLIMBING POLICY**

**OR/WA Supplement to BLM Manual Handbook H-1112-1
Safety and Health Management**

**December 2004
Oregon State Office**

H-1112-1 SAFETY AND HEALTH MANAGEMENT

15.6.1 Policy Statement and Purpose

The Oregon/Washington Bureau of Land Management (BLM) is committed to providing a safe and healthful work environment for all employees. The agency has various safe work procedures in place (administrative and engineering controls, work practice designs, and requirements for the use of personal protective equipment [PPE]) which assist in reducing employee exposure to hazards on the job, specifically fall hazards. Climbing and performing work on telecommunication towers presents unique challenges in order to ensure employee safety. The agency requires comprehensive training for climbing certification, specific physical fitness and medical qualifications, and mandates the consistent use of all identified safe work procedures and PPE.

The BLM maintains several telecommunication towers throughout Oregon and Washington. This policy outlines procedures to protect employees and contractors hired by the agency from the hazards that may be present when engaging in climbing and work activities on these towers. Tower climbing may be necessary to provide maintenance, inspection and/or other work activities that can expose workers to a dangerous working environment. A formal, comprehensive Risk Management Worksheet [Reference *Illustration 1*] must be completed by supervisors and employees prior to initiation of climbing activities. Agency policy requires that all employees who climb telecommunication towers to perform certain inspection and/or maintenance tasks must hold *qualified climber* credentials.

When feasible, communications towers should be designed to eliminate or minimize the need for climbing. It is recommended that all necessary work on these towers be performed on a contractual basis. All contracted work on telecommunication towers must adhere to the requirements of 29 CFR 1910.268 Special Industries – Telecommunications and BLM contractual specifications. Primary applicable standards, manuals and handbooks, and relevant Instructional Memorandums and Bulletins [IMs and IBs] are listed below.

- 29 CFR 1910.60 – Basic program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters
- 29 CFR 1910.268 Special Industries – Telecommunications (g)(1) Personal Climbing Equipment
- BLM Telecommunications Tower Climbing and Fall Protection Policy Manual [WO IM 98-120]¹
- Department Manual Part 485 – Safety and Occupational Health Program
- BLM Manual Section 1112 – Safety
- BLM Manual Handbook 1112-1 Safety and Health Management
- BLM Manual Handbook 1112-2 Safety and Health for Field Operations
- H-1112-1 OR/WA Fall Protection Program 1-322
- H-1112-1 OR/WA Personal Protective Equipment Policy 1-328
- WO IM 98-111 Radio Tower and Pole Climbing & Certification
- OR IB 98-303 Telecommunication Tower Climbing & Fall Protection Manual Guidance

¹ The Washington Office is currently preparing a BLM Manual Handbook supplement entitled *Tower Climbing and Fall Protection Program* which will be published as a handbook to Manual Section 1292 – Radio Communications.

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- OR IM 99-104 Restrictions on Telecommunication Tower Climbing
- WO IM 99-169 Physical Examination Guidelines for Tower Climbers
- OR IB 2001-096 Radio Tower Replacement Project
- OR IM 2002-049 Policy on Telecommunication Tower Climbing – Update and Clarification

The intent of this program is to provide general information and reference to specific guidance documents to enable employees who climb telecommunication towers, or, who administer contracts related to tower climbing, to understand the unique types of hazards and training requirements associated with this activity. OR/WA districts may use this program as a basic document and supplement as required. District policies must meet the minimum requirements of this program and noted references, the Telecommunications Tower Climbing and Fall Protection Policy, and all other applicable OSHA standards.

15.6.2 Scope

This policy applies to all employees who may be required to climb telecommunication towers to perform maintenance or repair tasks; or, who may serve as a contract officer representative (COR) when contractors are performing work on BLM towers. Consistent with assigned responsibility, employees must have a working knowledge of the various requirements of this program.

15.6.3 Roles and Responsibilities

Managers and supervisors, in cooperation with the State Office Tower Climbing and Fall Protection Program Coordinator and the State Safety Manager are responsible for implementing and administering the Telecommunication Tower Climbing Policy. Specific responsibility includes ensuring that:

- All employees involved in telecommunication tower climbing activities receive appropriate training, successfully complete a medical examination and meet physical fitness requirements
- The Risk Management Worksheet [Form 1112-5] is completed with pertinent work procedures clearly defined
- All employees engaged in climbing activities use the appropriate fall protection equipment and consistently use this equipment as well as all other items of assigned personnel protective equipment
- Contractors meet the minimum requirements of 29 CFR 1910.268 Special Industries – Telecommunications; and all BLM contractual requirements prior to performing work on towers.

Employees are responsible to adhere to all requirements of the Telecommunications Tower Climbing Policy and consistently use all personal protective equipment assigned for the work. Workers shall be responsible for inspecting their personal fall protection equipment prior to each use.

Only those employees who meet the physical fitness requirements, successfully pass the medical qualification standard, and, are properly trained and certified to climb telecommunication towers are authorized to engage in such activities. All employees must understand the requirements of the policy and abide by safe work practices when performing work on towers.

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Failure to follow these procedures is considered a serious safety violation and may result in disciplinary action.

15.6.4 Training and Certification

Each District must ensure that employees who are assigned telecommunication tower climbing activities adhere to the follow requirements specified by Bureau policy. Specifically, employees must meet *all* of the following to become a *Qualified Climber*.²

- Demonstrate knowledge of the Bureau Telecommunications Tower Climbing and Fall Protection Policy Manual, as well as this policy, specifically the hazards associated with climbing activities; and, PPE requirements
- Complete a BLM-approved climbing and fall protection class, including training in the principles of fall protection, the use and care of a full body harness, safety climbing devices, and the use of aerial manlifts and equipment transfer. Additional training should include tower rescue procedures and techniques
- Be thoroughly familiar with the basic requirements of the OR/WA Fall Protection Program and PPE Policy
- Complete a First Aid/CPR certification class and remain current in requirements
- Successfully pass a medical examination, meeting specific physical fitness requirements

Results of the medical/physical examination must be documented on the Department of the Interior *Standard Medical History and Examination Form*. This form may be found at the following website address: <http://medical.smis.doi.gov/pdf/t12d3.pdf#doi%20medical%20examination%20form>

The Bureau of Land Management National Training Center provides the following classes for tower climbing and related activities. Information regarding registration for these classes and other offerings can be found at the following website address: <http://www.ntc.blm.gov>. Click on the **TRAIN** link.

Course Code: 0468 Radio Frequency Safety Training

This class applies to all BLM personnel who could potentially work around transmitters and fulfills the OSHA Hazard Communication Standard [Employee Right To Know] requirement specified under 29 CFR 1910.1200 Hazard Communication

Course Description: This radio frequency site safety awareness training provides the information of accountability and responsibility to ensure a safe job site and focuses on FCC and OSHA regulations regarding radio frequency (RF) exposure. This course is recommended for telecommunication personnel, managers and supervisors, realty specialists who may work around such a site, and, for any employee responsible for safety policies and procedures.

Course Objectives: At a minimum, participants will understand the following;

- FCC and OSHA policies on RF radiation exposure hazards and related safety concerns
- Specific safe work practices required for compliance

² A qualified climber is not required to be a telecommunications technician; and, may be an employee that performs other functions requiring climbing activities.

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- How to assess a workplace to identify hazards that require the use of personal protective equipment [PPE]
- Understand the proper use and care of PPE, record keeping requirements and lock out/tag out procedures

Course Code: 0492 Tower Climb and Rescue

This class is open to all employees involved in tower climbing activities including design engineers and contracting officer representatives. However, the class is specifically designed employees who perform climbing activities.

Course Description: This course meets and/or exceeds all OSHA and State requirements for an employee to be certified to climb telecommunications towers. The course uses theoretical classroom sessions and practical hands-on exercises to increase fall protection knowledge. Climbers participate in exercises that include the use of all current engineered systems.

Course Objectives: Participants will gain knowledge in:

- The use of all commercially available fall protection systems specific to tower climbing activities
- The ability to determine the appropriate personal fall protection gear required for a particular tower
- The installation techniques for fall protection systems
- Safe climbing techniques
- Personal fall protection equipment inspection requirements
- Rescue techniques

15.6.5 Re-certification³

A qualified climber must maintain proficiency by demonstrating sufficient skill level in climbing techniques. The Program Coordinator at each district is responsible to provide an annual review of employee records to ensure current certification requirements are met by each individual.

All qualified climbers must successfully pass a periodic *medical* examination to ensure they continue to meet the required physical fitness requirements. As stated in Bureau policy, the frequency of examinations is based on employee age as well as medical and work history.

A qualified climber who has not climbed for a period of **one** year is required to be re-certified through a BLM-approved training class to maintain certification. All other qualified climbers who perform climbing activities at least once per year are required to be re-certified on a three year cycle to maintain certification.

³ Reference the Tower Climbing and Fall Protection Program for additional information regarding recertification requirements.

15.6.6 Specific Cautions and Limitations

Employees shall not climb and service radio antenna systems connected to live radio transmitting equipment. All transmitters should be de-activated and a Lock Out or Tag Out procedure [29 CFR 1910.147]⁴ applied to prevent re-activation during work activities. A personal Radio Frequency (RF) monitor shall be worn when climbing structures that may have active transmitters in the surrounding area.

During all climbing activities there shall be at least two qualified climbers present at the job site to ensure safe work procedures are followed, and to initiate rescue procedures if necessary. The ultimate responsibility for determining whether or not to initiate climbing activities on a tower and perform elevated work remains with the individual employee [qualified climber] following a thorough assessment of all associated hazards, including current environmental conditions.

Employees shall be attached to an anchorage point at all times when working, transitioning or resting at elevated locations above four feet. Moving, relocating, transitioning, and transferring are all activities that are incidental to the work and thus require attachment to at least one anchorage point at all times. Climbers must establish a safe *drop zone*⁵ near the tower when positioning at work location.⁶

15.6.7 Documentation and Record Keeping

Documentation shall consist of a certificate indicating that the individual has successfully completed the course of instruction and possesses the proficiency required as stated in the Tower Climbing and Fall Protection Program. Demonstrated proficiency must be included in the documentation and made when the employee successfully completes the training.

All documentation shall be retained in the employee personnel file for the duration of employment.

⁴ Reference the OR/WA Control of Hazardous Energy Program (Lockout/Tag Out)

⁵ The *drop zone* is the area around a tower/structure in which items will likely land if dropped from overhead. This zone is defined as .5 feet out from the structure base for every foot in elevation above the base of the structure.

⁶ The work position is the elevated location on the structure or equipment where the worker is in position to perform the assigned work or task.

**H-1112-1 SAFETY AND HEALTH MANAGEMENT
Risk Management Worksheet***

(*Official form may be referenced on the Safety Website and the BLM Forms Link on the Intranet.)

For Illustration Only

1. Organization and Location										2. Page ____ of ____				
3. Operation/Task					4. Beginning Date		5. Ending Date		6. Date Prepared					
7. Prepared by (Name/Duty Position)														
8. Identified Hazards		9. Assess the Hazards: Initial Risk			10. Control Measures Developed for Identified Hazards (include all PPE)			11. Assess the Hazard's Residual Risk		12. How to Implement the Controls		13 Supervisors and Evaluation By		
(Be Specific)		L	M	H	E	(Be Specific)			L	M	H	E	(Be Specific)	(Be Specific)
14. Remaining Risk Level After Control Measures Are Implemented. (Circle Highest Remaining Risk Level)					LOW Line Supervisor		MEDIUM (Branch Chief)		HIGH (District Manager)		EXTREMELY HIGH (Must be State Director/Associate)			
15. RISK DECISION AUTHORITY: (Approval/Authority Signature Block) [If initial risk level is Medium, High or Extremely High, brief risk decision authority at that level on controls and control measures used to reduce risks) NOTE: If the person preparing the form signs this block, the signature indicates only that the appropriate risk decision authority was notified of the initial risk level, control measures taken and appropriate resources required; and, that the risk was accepted by the decision authority.]														
<div style="border-top: 1px solid black; width: 50%; margin-left: 0;"></div> <p align="center">Signature</p>														

Form 1112-5
(May 2001)